UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KELI P. MAY, SHARON SOUSA, and THOMAS BODOVINAC, Individually and on behalf of others similarly situated,

Case No.: 2:15-cv-02142-RFB-CWH

Plaintiffs.

VS.

WYNN LAS VEGAS, LLC, and "JOHN DOE CORPORATIONS" 1 to 50, name fictitious, actual name and number unknown,

Defendants.

NOTICE OF THE PENDENCY OF THIS ACTION PURSUANT TO 29 U.S.C. § 216(b) AND FOR OTHER RELIEF

INTRODUCTION

The purpose of this notice is to:

- (1) inform you of the existence of a lawsuit in which you may be "similarly situated" to the named plaintiffs;
 - (2) advise you of how your rights may be affected by this lawsuit; and
- (3) instruct you on the procedure for participating in this lawsuit, if you choose to do so.

This Notice **is not an** expression by the court of any opinion as to the merits of any claims or defenses asserted by any party to this action as those issues have not been decided.

DESCRIPTION OF LAWSUIT

This lawsuit was filed on October 14, 2015. Plaintiffs allege that Wynn Las Vegas, LLC violated the Fair Labor Standards Act and Nevada Law. Specifically, Plaintiffs claim that they are owed overtime pay for all hours they worked over forty (40) hours per week. The plaintiffs are seeking unpaid wages and liquidated damages (double damages) in an amount equal to the unpaid wages owed to them under the Fair Labor Standards Act.

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COMPOSITION OF THE CLASS

The Class of persons eligible to respond to this Notice and participate in this case are all employees who did work as security officers and attended pre-shift briefings for Wynn Las Vegas, LLC in the State of Nevada who performed such work after October 14, 2012 and security officers who worked more than 40 hours a week and did not receive overtime pay.

YOUR RIGHT TO PARTICIPATE IN THIS LAWSUIT

If you are a member of the class eligible to participate in this case and fit the definition above, you may join this case by mailing the enclosed "Consent To Join" form to Plaintiffs' counsel at the following address:

Christian Gabroy, Esq. 170 S. Green Valley Pkwy Suite 280 Henderson, NV 89012

If you want to join this lawsuit, you must send the form to Christian Gabroy so that he has time to file it with the Federal Court on or before December 29, 2016. If you do not return the "Consent to Join" form in time for it to be filed with the Federal Court, you may not be able to participate in the Fair Labor Standards Act portion of this lawsuit.

EFFECT OF JOINING THIS LAWSUIT

If you choose to join this case, you will be bound by the decision of the court, whether it is favorable or unfavorable.

The attorneys for the class plaintiffs are being paid on a contingency fee basis, which means that if there is no recovery, plaintiffs will not have to pay attorneys' fees to the plaintiffs' attorneys. You may have to give a deposition. If the plaintiffs prevail in this litigation, the attorneys for the class will request that the Court either determine or approve the amount of attorneys' fees and costs they are entitled to receive for their services.

If you sign and return the "Consent to Join" form you are agreeing to:

- (1) designate plaintiffs as your agents to make decisions on your behalf concerning this lawsuit;
 - (2) the method and manner of conducting this lawsuit;
 - (3) enter into an agreement with plaintiffs' counsel concerning attorneys' fees and costs; and
 - (4) all other matters pertaining to this lawsuit.

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These decisions and agreements made and entered into by the representative plaintiffs will be binding on you if you join this lawsuit. However, the court has retained jurisdiction to determine the reasonableness of any settlement with the defendant, and any agreement concerning the reasonableness of any attorneys' fees and costs that are to be paid to the plaintiffs' counsel should plaintiffs succeed in this action.

LEGAL EFFECT OF NOT JOINING THIS SUIT

You do not have to join this lawsuit. If you do not wish to participate in this lawsuit, then do nothing. If you choose not to join this lawsuit, you will not be affected by any judgment or settlement rendered in this lawsuit, whether favorable or unfavorable to the class. This means if the plaintiffs win you will not collect any money from the Fair Labor Standards Act portion of this lawsuit. If you choose not to join in this lawsuit you are free to file your own lawsuit under the Fair Labor Standards Act.

STATUTE OF LIMITATIONS ON POTENTIAL CLAIMS

The maximum period of time that you may collect unpaid wages under the Fair Labor Standards Act is three (3) years from when you worked the hours, but were not paid overtime. The statute of limitations continues to run until you file with the court a written consent to join this lawsuit or initiate your own lawsuit to collect your unpaid wages.

NO RETALIATION PERMITTED

Federal Law does not allow Wynn Las Vegas, LLC to discharge you or discriminate against you because you have exercised your rights under the Fair Labor Standards Act to seek compensation.

YOUR LEGAL REPRESENTATION IF YOU JOIN

If you choose to join this lawsuit and agree to be represented by the named plaintiffs through their attorney, your counsel in this action will be:

Christian Gabroy, Esq. Gabroy Law Offices 170 S. Green Valley Pkwy. Henderson, Nevada 89012

and

Leon Greenberg, Esq. 2965 South Jones Blvd #E-3 Las Vegas, Nevada 89146

FURTHER INFORMATION Further information about this Notice, the deadline for filing a "Consent to Join" form, or questions about this lawsuit may be obtained by contacting Christian Gabroy, Esq. 170 S. Green Valley Pkwy. Suite 280 Henderson, NV 89012 (702) 259-7777 Christian@gabroy.com The court has taken no position in this case regarding the merits of the plaintiffs' claims or the defendants' defenses. DO NOT CONTACT THE CLERK OF THE COURT DATED this 1st day of September, 2016. RICHARD F. BOULWARE, II United States District Judge

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2	CONSENT TO JOIN PURSUANT TO 29 U.S.C. §216(b) May, et al v. Wynn Las Vegas LLC, Case No.: 2:15-cv-02142-RFB-CWH (D. Nev.)
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4	TO: THE CLERK OF COURT AND TO EACH PARTY AND COUNSEL OF RECORD
5	I reside at
6	(Street and include any Apartment Number)
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8	(City) (State) (Zip Code)
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10	My home telephone number is:
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12	My current email address (if any) is:
13	I understand that a lawsuit has been brought under the Federal Fair Labor Standards
14	Act. I have read and I understand the notice accompanying this consent. I agree to be bound by any judgment of this Court in this lawsuit.
15	I understand and agree that I designate the named plaintiffs as my agents and
16 17	understand that I will be bound by the decisions and agreements made by and entered into by said plaintiffs.
18	I understand that I will be represented by Christian Gabroy, Esq. and Leon Greenberg,
19	Esq. and that this Court has retained jurisdiction to determine the reasonableness of any
20	settlement of any attorneys' fees and costs that are to be paid to the plaintiffs' counsel, should plaintiffs prevail.
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22	(Signature) (Type or Print Name)
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24	FOR THIS FORM TO BE EFFECTIVE IT MUST BE FULLY FILLED OUT, SIGNED,
25	AND RETURNED TO:
26	CHRISTIAN GABROY, ESQ. GABROY LAW OFFICES
27	170 S. GREEN VALLEY PKWY. SUITE 280
28	HENDERSON, NV 89012 BY DECEMBER 29, 2016
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